

Commonwealth of Kentucky
Division for Air Quality
RESPONSE TO COMMENTS

TITLE V PERMIT No. V-06-029
FOR DART CONTAINER CORPORATION OF KENTUCKY
NOVEMBER 09, 2006
LUIS D. FUENTES, REVIEWER

SOURCE DESCRIPTION:

Dart Container Corporation of Kentucky ('Dart'), located in Horse Cave, Kentucky, produces a variety of food service containers including cups, containers, plates, lids, and utensils. Dart operates six different manufacturing processes on-site: expandable polystyrene container manufacturing, direct injection foam extrusion and thermoforming, impact extrusion and thermoforming, OPS extrusion and thermoforming, paper cup manufacturing and cutlery injection molding.

Title V permit V-97-037 was issued to Dart in March 1998 for the operations listed above. This permit was issued as synthetic minor permit. Dart Container requested a source wide VOC emissions limit of 240 TPY to preclude the applicability of to 401 KAR 51:017, Prevention of Significant Deterioration of the Air Quality (PSD). In April 2001, the permit was revised to include a project, which was subject to PSD.

Since the operation of making cups has been discontinued, the following emission points have been removed and are not included in permit V-06-29:

- 1) Emission point # 09 (PAPERPRINT-01): In-line UV ink printers and Off-line printers
- 2) The insignificant activities associated with this process:
 - Paper cup machines
 - Paper cup roll splitter.

The rest of the processes listed above will be unchanged. Dart submitted Compliance Assurance Monitoring (CAM) plans for the emission control equipment for the Direct Injection (DI) Foam Extrusion process and the Expandable Polystyrene (EPS) Container Manufacturing process.

Dart submitted the renewal application on August 28, 2002. This permit is being issued as a Title V permit.

PUBLIC AND U.S. EPA REVIEW:

The public notice on availability of the draft permit and supporting material was published in the newspaper of the largest general circulation in the area of the source. The public comment period expired on November 4, 2006.

Comments were received from Dart Container on October 30, 2006. Attachment A to this document lists the comments received and the Division's response to each comment. Minor changes were made to the permit as a result of the comments received, however, in no case were any emissions standards, or any monitoring, recordkeeping or reporting requirements relaxed. Please see

Attachment A for a detailed explanation of the changes made to the permit. The U.S. EPA has 45 days to comment on this proposed permit.

CREDIBLE EVIDENCE:

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has only adopted the provisions of 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12 into its air quality regulations.

ATTACHMENT A

Response to Comments

Comments on the Dart Container Corporation Kentucky Draft Title V Air Quality Permit submitted by Amanda Bishop.

Draft Permit

1. When looking over the draft permit V-06-029, it has come to our attention that the EPS throughput number that is referenced in the description for emission point 04 is incorrect. The 7603 TPY number, which doesn't account for the operating pre-expander collection system, as documented in the draft permit was not that of which was referred to in the Title V renewal application which showed 14,295.77 TPY assuming a 1 % capture rate and a 95 % destruction rate. It is our request, that DAQ change that total in the permit to 14,295.77. We also understand that this number is not a limit but included only as part of the source description

Division's response: comment acknowledged, the Maximum Operating Capacity number was changed to 14,295.77 TPY on page 5 of the permit.

2. There is an error in the equation on page 14 of the draft permit. The blowing agent directed to the RTO calculation for emission groups 10 -18 should not have the destruction efficiency multiplication as that is accounted for in the Daily emission rate calculation.

Division's response: comment acknowledged, the Destruction efficiency of RTO was removed from the Blowing agent directed to RTO calculation, on page 14 of the permit.

3. Dart is also uncertain as to what "10, 11, 14, and 15 always be operational" means in condition 1.B of emission groups 10-18 BACT requirements. As per our discussions, based on the monitoring requirements in 4.d combined with the need to safely shut down an extruder it may take Dart up to 30 minutes to confirm that the RTO is not operational and safely shut down the extrusion lines so that no blowing agent is left in a foam extruder. The reclaim extruders, where the majority of the captured emissions are occurring, can be safely shut down as soon as an RTO failure is identified. The additional delay required to safely turn off the blowing agent and run it out of the foam extruder should not cause Dart to exceed its permit limits. To that end, Dart wonders if wording that allows for this 30-minute foam line shut down process should be included in conditions 1.a. or 1.b. Dart is also concerned that we can not capture the emissions during start-up since access to the die is required to remove the molten plastic until it falls within the correct temperature range to allow string up of the line. This typically takes 35 minutes per line.

Division's response: comment acknowledge. The Operation Limitations/ BACT requirement 1.b on page 12 of the permit was modified to the following language: " The VOC emissions shall be captured by the "capture equipment" as listed in table 1 at all times after the foam lines are strung up (emission points 10 and 11) and any time emissions units 14 and 15 are in operation. A 30 minute shut down period will be allowed for the emissions points 10 and 11 after an RTO malfunction is identified to allow for safe shut down.

4. Dart also would request the paper wrapped cup machines that the department was notified of on August 31, 2005; as well as a follow up letter to Mr. Gosney on November 8, 2005 be included in the insignificant listing in section C of the permit.

Division's response: comment acknowledged, the paper wrapped cup machine was included in the insignificant listing section C of the permit.

5. The item 6 in the insignificant listing should read "Zig Zag printer using UV ink.

Division's response: comment acknowledged, the item 6 in the insignificant listing was changed by the corrected name.